## **EXHIBIT 11**



## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In Re: Methyl Tertiary Butyl Ether ("MTBE") Products Liability Litigation,

Master File No. 1:00-1898 MDL No 1358 (SAS) M21-88

## This Document Relates to:

New Jersey Dept. of Envtl. Prot., et al. v. Atlantic Richfield Co., et al., No. 08 Civ. 312 No. 1:09-CV-06554 (SAS) DECLARATION OF STEVE HARDIN FOR THE SHELL DEFENDANTS PURSUANT TO CMO 75

- 1. Pursuant to Case Management Order #75 ("CMO #75"), defendants Shell Oil Company, Shell Oil Products Company LLC, Shell Trading (US) Company, Equilon Enterprises LLC and Motiva Enterprises LLC (collectively, the "Shell Defendants") submit the following declaration identifying their ownership and/or lease interest in the real property and underground storage tanks ("USTs") at the Ridgewood Trial Site selected by Plaintiffs on August 6, 2010 and September 13, 2010 as a "discovery site" and later selected on February 10, 2011 as a Trial Site pursuant to CMO #83.
- 2. My name is Steve Hardin. I am a Real Estate Advisor for Shell Oil Company. At the request of counsel, I have reviewed the Shell Defendants' Real Property Index database ("RPI") and SAP Database, to investigate whether the Shell Defendants owned or leased USTs and/or the real property at the selected "discovery sites."
- Certain data in RPI and SAP concern USTs and real property owned or leased by the Shell Defendants.
- 4. Prior to 1979 until December 2011, the Shell Defendants owned the USTs located on the real property at 657 Rt. 17 & Franklin Turnpike, Ridgewood, New Jersey (State Site ID # 11346). Prior to 1979 until 1985, the Shell Defendants leased the real property at 657 Rt. 17 &

Franklin Turnpike, Ridgewood, New Jersey from the owner of the real property. From 1985 to December 2011, the Shell Defendants owned the real property at 657 Rt. 17 & Franklin Turnpike, Ridgewood, New Jersey. In December 2011, the Shell Defendants sold the real property at 657 Rt. 17 & Franklin Turnpike, Ridgewood, New Jersey to Petroleum Marketing Group.

I am informed and believe that the matters stated herein are true and correct. I declare under penalty of perjury under the laws of the State of New Jersey that the foregoing is true and correct. Executed this 14 day of September 2012 in Bellingham, WA.

Steve Hardin, Real Estate Advisor

Shell Oil Company